

1 RENE L. VALLADARES  
Federal Public Defender  
2 State Bar No. 11479  
BRIAN PUGH  
Assistant Federal Public Defender  
3 Law Office of the Federal Public Defender  
411 E. Bonneville Avenue, Suite 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
Brian\_Pugh@fd.org  
6 Attorney for Karen Chapon

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

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9 UNITED STATES OF AMERICA, )  
10 )  
Plaintiff, )  
11 )  
vs. )  
12 )  
KAREN CHAPON, )  
13 )  
Defendant. )  
14 )

Case No: 2:20-cr-286-JCM-NJK

**EMERGENCY STIPULATION TO  
MODIFY CONDITIONS OF RELEASE  
(EXPEDITED TREATMENT  
REQUESTED)**

15 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
16 Acting United States Attorney, and Jessica Oliva, Assistant United States Attorney, and Rene L.  
17 Valladares, Federal Public Defender, and Brian Pugh, Assistant Federal Public Defender, counsel  
18 for Karen Chapon, that Ms. Chapon's pretrial release travel condition be amended to allow Ms.  
19 Chapon to travel to the State of Colorado as outlined in paragraph 5, below.

20 This stipulation is entered into for the following reasons:

21 1. Ms. Chapon's father is dying of cancer and was recently placed in the care of  
22 hospice. The defense has provided her pretrial services officer and the government with  
23 verification of hospice care.  
24

1           2.     Ms. Chapon requests that she be permitted to travel to Colorado to visit her father  
2 before he passes. There may not be much time before her father passes.

3           3.     Ms. Chapon has been on pretrial supervision for eight months. During that time,  
4 she has had a minor violation which is being addressed by Ms. Chapon agreeing to forfeit her  
5 medical marijuana card.

6           4.     Ms. Chapon's pretrial services officer has no objection to modifying her  
7 conditions of release to permit travel to the State of Colorado.

8           5.     Ms. Chapon has arranged to fly to Colorado on Friday, July 9, 2021, stay in the  
9 home of her parents, and return on July 26, 2021. More detailed information, including her  
10 parent's address, was provided to her pretrial services officer.

11          6.     The parties agree to this modification.

12          Dated this 9th day of July 2021.

13          RENE L. VALLADARES  
14          Federal Public Defender

Christopher Chiou  
Acting United States Attorney

15          By /s/ Brian Pugh  
16          BRIAN PUGH  
Assistant Federal Public Defender  
Counsel for Defendant

By /s/ Jessica Oliva  
JESSICA OLIVA  
Assistant U.S. Attorney

17          ORDER

18          IT IS SO ORDERED.

19            
20          BRENDA WEKSLER  
United States Magistrate Judge

21          DATED:     July 9, 2021  
22          \_\_\_\_\_